

Hanford Advisory Board Draft Advice

Topic: System Planning Progress

Authors: Harold Heacock & Jeff Luke

Originating Committee: Tank Waste

Version #1 : **Color:** X pink yellow green buff purple blue

Background

The System Plan integrates various Single-Shell Tank (SST) retrieval scenarios with potential treatment options for the waste from those SST retrievals. Little is of greater concern and consequence to the cleanup of the Hanford Site. Little is of greater consequence to the public relative to Hanford, than the retrieval and treatment of these wastes.

Comprehensive system planning is a critical element in retrieving and treating Hanford's tank waste and in operating the Waste Treatment Plant (WTP). The choices made from the insights gained in systems planning can shift the Hanford cleanup mission by billions of dollars and nearly a decade. These choices also have large impacts in how waste is retrieved that in turn impact operations, safety and cost. The best case options for WTP operations could result in tank retrievals that cause the retrieval contractor to move repeatedly from farm to farm. At the other extreme, the best case options for tank waste retrieval, doing one farm at a time, could lead to problems in the composition of the waste fed to the WTP extending its mission by nearly a decade and causing safety and operational issues.

Since 2000, the Department of Energy (DOE) - Office of River Protection (ORP) has invited members of the Tank Waste Committee (TWC) of the Hanford Advisory Board (Board) to participate in a series of discussions and planning by DOE-ORP and its contractors on systems planning, secondary wastes, and waste retrieval, processing and disposal. This historical involvement has led to significant participation and has spearheaded advice, which the Board has adopted, to DOE-ORP and Washington State Department of Ecology (Ecology).

These discussions and resulting studies cumulated in a series of system plans, folding existing data and modeling efforts into one comprehensive framework that DOE-ORP updates and revises annually, the most recent being System Plan Revision 4.

DOE-ORP now begins this system planning process each October and roughly takes a year from start to finish. To be meaningfully involved and to provide meaningful advice, Board members need to have access to preceding plans and assumptions. DOE-ORP has not released the recent plan (revision 5), and just recently released the assumptions the plan was based upon to the TWC in October. As a result, the Board cannot provide comment on the current plan in preparation for the next plan (revision 6).

With the latest Tri-Party Agreement changes, Ecology is formally involved in developing planning scenarios every third year, with revision 6 now in development being the first of these opportunities. This timing is difficult. Due to the late release of the assumptions, the Board will not be able to participate or comment meaningfully on revision 6.

- The Hanford Federal Facility Agreement and Consent Order (HFFACO), Milestone M-062-40, requires that the U.S. Department of Energy, Office of River Protection (ORP) issue a System Plan beginning October 31, 2011, and every three years thereafter. To support the modeling necessary to develop the System Plan, Milestone M-062-40 also requires that, *“One year prior to the issuance of the system plan, DOE and Ecology will each select the scenarios (including underlying common and scenario-specific assumptions) that will be analyzed in the system plan, with DOE and Ecology each having the right to select a minimum of three scenarios each.”*

In tandem with the issue of apparent withholding of public information by both federal and state agencies, the Board is concerned that adequate integrated system planning and future funding requirements are not identified and transparent to the public. We believe this is necessary to build the collective vision for the successful planning development of retrieval, processing and disposal of the SST wastes including the processing of secondary waste streams from the WTP. The magnitude of funding requirements and the scale of facilities necessary for retrieval, processing and disposal of these wastes are daunting. Transparent integration is the linchpin that will determine the success of Hanford Site cleanup.

Advice

The Board requests that both DOE-ORP and Ecology identify to the Board the point(s) in the system planning process where the scenarios to be considered for analysis are developed and where the Board may meaningfully participate in that scenario development process. The Board reminds the agencies that to be meaningful means to follow the Board's processes and procedures. Advice must come first from the committee, and then the full Board adopts it. This process normally requires at least one month of lead time.

The Board also requests that, when identifying these points of participation, DOE-ORP and Ecology consider the Board's previous advice (Advice #233, #209 and #189) in developing this process and plans.

The Board recommends DOE-ORP and Ecology ensure the system planning process is as open and transparent as possible, with the assumptions and the bases under consideration to be made publicly available far in advance of each new revision. This advance notice will allow both the Board and the public an opportunity to review and provide comments on the assumptions before the revision to the system plan begins.